

IN THE UNITED STATES BANKRUPTCY COURT
FOR THE WESTERN DISTRICT OF PENNSYLVANIA

In Re:	:	BANKRUPTCY NO. 25-10027-CMB
	:	
KARL WILLIAM KROUSE AND	:	
BETTY CORINNE KROUSE,	:	HON. CARLOTA M. BÖHM
Debtors	:	
	:	
M & T BANK,	:	CHAPTER 13
Movant,	:	
	:	RELATED TO CLAIM #2
v.	:	
	:	
KARL WILLIAM KROUSE AND BETTY CORINNE	:	
KROUSE; and RONDA J. WINNECOUR,	:	
CHAPTER 13 TRUSTEE,	:	
Respondents.	:	

DECLARATION REGARDING POST-PETITION MORTGAGE FEES, EXPENSES AND CHARGES

I hereby certify as counsel for the Debtors that the existing Chapter 13 Plan is adequately funded
and that there is no need to file an amended Chapter 13 Plan.

Respectfully submitted,

THE QUINN LAW FIRM

BY: /s/ Michael S. Jan Janin
Michael S. Jan Janin, Esquire
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Debtors :
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M & T BANK, : CHAPTER 13
Movant, :
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v. : RELATED TO CLAIM # 2
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KARL WILLIAM KROUSE AND BETTY CORINNE :
KROUSE; and RONDA J. WINNECOUR, :
CHAPTER 13 TRUSTEE, :
Respondents. :

**CERTIFICATE OF SERVICE OF DECLARATION REGARDING
NOTICE OF MORTGAGE PAYMENT CHANGE**

I certify under penalty of perjury that I served the above captioned pleading on the parties at the addresses specified below or on the attached list on March 3, 2025.

The types of service made on the parties was sent via CM/ECF Notification System (NO PAPER COPY) to:

- Office of the United States Trustee at ustpregion03.pi.ecf@usdoj.gov
- Ronda J. Winnecour at cmecf@chapter13trusteewdpa.com
- Brent J. Lemon on behalf of Creditor M&T BANK at blemon@kmlawgroup.com

EXECUTED ON: March 3, 2025

Respectfully submitted,
THE QUINN LAW FIRM

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